

Arkansas Secretary of State Sharon Priest

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January 30, 2002

Ms. Penelope Bonsall
Director, Office of Election Administration
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Subject: Voting Systems Standards—comment

Dear Ms. Bonsail:

Both volumes of the Voting System Standards provide an impressive amount of depth and detail. Though Arkansas has not officially adopted these standards, they do provide the guide used in approving systems for our state. Our local election officials depend on the fact that voting equipment works accurately and is reliable, and the FEC approved standards provide this safeguard.

In the Federal Register Notice, it is indicated that there is the need to recognize human interface considerations as being an integral part of developing voting systems. The notice also indicates the FEC is planning to develop specifications to be used in conjunction with its standards with regard to human factors. With this in mind, I would suggest an additional category to your standards report to include the necessary user level for each system type.

The technological complexity of some electronic voting systems oftentimes demands a user level that is far above the average election official. If federal approval is given to systems based on very important and stringent criteria, but no rating is given as to the difficulty of usage, the election administrators purchasing the systems may find themselves with a system they cannot operate successfully. I believe part of the voting system standards should include level of technological requirements needed to use it, manage it, and maintain it.

Thank you for this opportunity to offer comments to this very important process on behalf of the Arkansas Secretary of State. I would be happy to present comments in-person to the Commission if requested.

Sincerely,

Susan Inman

Director of Elections